

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03-cv-9849

**NOTICE OF RULE 60(a) MOTION FOR
CORRECTIONS TO PARTIAL FINAL JUDGMENT**

Plaintiffs by undersigned counsel move under Federal Rule of Civil Procedure 60(a) for an order correcting this Court's July 31, 2019 Order of Partial Final Default Judgments on Behalf of Burnett/Iran Plaintiffs Identified at Exhibit A (Burnett/Iran VI) (ECF No. 4712), and for reason state as follows:

- 1) Plaintiffs have discovered errors in nine (9) lines of Exhibit A to ECF No. 4706.
- 2) These nine errors consist of: one (1) individual whose relationship to the 9/11 decedent was incorrectly noted creating an incorrect value for the damages judgment; one (1) individual who is actually a Domestic Partner and should not have been included in the Order absent an additional showing that he qualified as a "functional equivalent"; one (1) individual who is actually a step-parent and should not have been included in the Order absent an additional showing that he qualified as a "functional equivalent"; four (4) misidentified individuals; and two (2) individuals whose United States nationality remains in question. These errors are a result of clerical mistakes or arise from an oversight or omission on the part of Plaintiffs' counsel.

- 3) These errors have the potential to create issues for Plaintiffs enforcing and collecting judgment.

WHEREFORE, Plaintiffs respectfully request the issuance of the Corrected Order of Partial Final Default Judgments on Behalf of Burnett/Iran Plaintiffs as set forth in Exhibit A to this motion.

Dated: August 9, 2019

Respectfully submitted,

/s/ John Eubanks
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